Peter A. Romero

David D. Barnhorn dbarnhorn@romerolawny.com

October 13, 2022

VIA ECF

Hon. John G. Koeltl United States District Judge United States District Court Southern District of New York 500 Pearl Street New York, New York 10007 APPLICATION GRANTED
SO ORDERED

John G. Koeltl, U.S.D.J.

Re:

Candelario Cordero v. Elezaj & Sons Realty Associates, LLC, et al.

Docket No.: 21-cv-06899 (JGK)

Dear Judge Koeltl:

This firm represents Plaintiff Candelario Cordero in the above-referenced matter brought against Defendants Elezaj & Sons Realty Associates, LLC, Marash Elezaj, and Kola Elezaj, for alleged violations of the Fair Labor Standards Act and New York Labor Law. Having reached a settlement in principle, the Court entered an order directing Plaintiff to submit his motion for approval of the parties' settlement, pursuant to Cheeks v. Freeport Pancake House, Inc., 796 F.3d 199 (2d Cir. 2015), with respect to Plaintiff's FLSA claims by October 14, 2022. The parties have made substantial progress negotiating the terms of their final settlement. However, they are continuing to work to resolve certain terms and will then require time for the parties to sign their formal settlement agreement. Accordingly, Plaintiff requests, with Defendants' consent, a two-week extension of time to submit their motion from October 14, 2022 until October 28, 2022. This is Plaintiff's first request for the relief sought.

Respectfully submitted,

/S/ David D. Barnhorn, Esq. DAVID D. BARNHORN, ESQ.

C: All Counsel of Record via ECF